

**REMARKS**

This is intended as a full and complete response to the Office Action dated September 16, 2004, having a shortened statutory period for response set to expire on December 16, 2004. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, the paragraph 29 has been amended to correct minor editorial problems. Claims 1-53 are pending in the application. Claims 1, 10, 27, 43, 45, and 52 have been amended. Claims 1-53 remain pending following entry of this response. Applicants submit that the amendments do not introduce new matter.

**Claim Rejections - 35 USC § 102**

Claims 1, 3-4, 8-9, 21-23, 26 and 43-44 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,167,567 to *Chiles et al.* (hereinafter "*Chiles*").

Applicants respectfully traverse this rejection. Establishing a *prima facie* case of anticipation under 35 U.S.C. § 102(e) requires that a reference teach every element disclosed by a claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989) (emphasis added).

*Chiles* discloses techniques for updating software stored on a client computer in a networked client-server environment. Specifically, *Chiles* teaches using a script stored on a network server that "contains appropriate update information." *Chiles*, Abstract. A client updating application is used to connect to a server and periodically download updates for software installed on a client computer system. *Chiles*, 3:53-61. The version of the software used to provide the update may be selected from a plurality of versions stored at the server. The actual version selected may be determined using the update script processed on the client system. *Chiles*, 13:3-30. Once the selected

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update is downloaded to the client computer, the update application executes the update.

Regarding claims 1 and 21, *Chiles* provides for processing country (or geographic locale) information on a client computer system. Specifically, after a user (or an automatic process) initiates an update request, an application "executing at the client PC" determines, through an API call to the operating system running on the client, the country (or geographic locale) in which the client PC resides. *Chiles*, 12:50-62. "This country was specified by the user of that PC typically during initial installation of its client operating system." *Ibid.* Once a client update application "discerns the country or locale, operations occur through which the client PC reads the operating system registry for a URL for an FTP site that contains the update script(s)" for the product being updated. *Chiles*, 12:62-65. The client PC then "performs operations to construct a country (or locale) specific file name for the desired update script." *Chiles*, 13:3-5. Thereafter, the "client PC issues a request ... [to the] FTP server therein for an FTP download, from the script directory, of the specific file for the update script." *Chiles*, 13:13-16.

Thus, *Chiles* teaches discerning the country or locale in which the client PC resides. This discernment is done on the client PC. Even assuming the country or locale information taught by *Chiles* is capable of being characterized as an internationalization context, this context never leaves the client PC in the system of *Chiles*. Accordingly, *Chiles* cannot, and does not, disclose a server configured with an internationalization application programming interface configured to extract an internationalization context provided by a client device, wherein the internationalization context specifies geographically specific parameters for the client device. Further, for the same reason, *Chiles* fails to disclose using a resource manager configured to receive the internationalization context extracted by the server and process a request received from the client device using the internationalization context. Accordingly, Applicants submit that claims 1 and 21 are patentable over *Chiles*.

Regarding claim 43, the Examiner asserts that *Chiles* teaches a computer data signal embodied in a transmission medium, comprising an internationalization context containing at least a locale specification and a time zone identifier, wherein the internationalization context configures a processor of a computer to process requests according to the internationalization context. *Chiles*, however, fails to disclose using a time zone identifier for any purpose. Thus, because *Chiles* fails to disclose "every element as set forth in the claim," *Verdegaal Bros.*, 814 F.2d 628, 631, Applicants submit that claim 43 is patentable over *Chiles*.

Regarding claims 3-4, 8-9, 21-23, 26, and 44 each of these claims depends from one of independent Claims 1, 21 or 43. Because Applicants believe to have traversed the rejection regarding independent Claims 1, 21, and 43, Applicants assert that the rejection, as applied to these dependent claims, is also traversed.

Applicants, therefore, respectfully request that the Examiner withdraw the rejection to claims 1, 3-4, 8-9, 21-23, 26 and 43-44.

Claims 10-20 and 27-52 are rejected under 35 U.S.C. § 102(e) as being anticipated by *Levy et al.* (U.S. Patent Application No. 2002/0184308, hereinafter "*Levy*"). Applicants respectfully traverse the rejection.

*Levy* provides a system for processing data in a multiple locale or multilingual environment. *Levy*, Abstract. Generally, data from a data source or "business object" is transformed into a "universal system format" for processing on the server. *Levy*, ¶ 47. The system of *Levy* works on the basis of "normalization and de-normalization." *Ibid*. That is, on the server "all of the business data in the business object should be normalized into a single system format. ... When the business object comes to the point where it interacts with the outside world, the data needs to be transformed to the format that is required by the corresponding data source or destination." *Levy*, ¶ 50. Thus, internally all business objects, from any source, are normalized for server-side processing.

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Regarding claims 10 and 33, the Examiner asserts that *Levy* teaches a method that includes receiving a first request from a client at a server and receiving a second request from the client at the server, wherein the second request comprises an internationalization context for processing the first request. However, the material cited by the examiner provides:

It is also possible that when a user logs in, the user's preferences will specify a list of preferred locales. For example, a user can set German as the choice for the language to be used with the user interface, and set French as the second choice, and set English as the third choice. In most cases, the locales that the user can select from are determined from what the system supports. The system therefore needs to determine which locale the system might use as the user's UI locale. The resulting list of available UI Locale that the system supports comes from certain "installed locale" settings which might exist in the AGS configuration file (i.e., an XML file named "GlobalServices.xml"). The list of preferred UI locales comes from the user preferences, and there must be an exact match between language and country. *Levy*, ¶ 76.

As this paragraph makes clear, *Levy* teaches a system where a user logs in and the user interface is presented using local data according to a first preference, and if the first preference is unavailable using second, or third preferences. That is, *Levy* teaches determining what locales are available to best match a user's preferences regarding a user interface and locale information. *Levy* fails to disclose, however, the processing of a first request using contextual information presented in a second request. Accordingly, Applicants submit that claims 10 and 33 are patentable over *Levy*.

Regarding claim 27, the Examiner asserts that *Levy* teaches parsing a message from a client computer, wherein the message contains internationalization context; extracting the internationalization context from the request; and providing the internationalization context to an application in order to configure the application to process a request from the client computer according to the internationalization context provided by the client computer. *Levy* however, as described above, teaches a system for multilingual processing wherein all data incoming to a central server is normalized into a universal system format and de-normalized when transmitted to a client. Therefore, *Levy* does not teach parsing a message from a client computer.

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wherein the message contains internationalization context; extracting the internationalization context from the request; and providing the internationalization context to an application in order to configure the application to processes a request from the client computer according to the internationalization context provided by the client computer. Accordingly, Applicants submit that claim 27 is patentable over *Levy*.

Regarding claim 45, the Examiner asserts that paragraph 14 of *Levy* teaches propagating internationalization context information, comprising: receiving, at a first computer, a first request from a second computer, the first request including an internationalization context. As described above, however, *Levy*, ¶ 14 teaches using normalization and de-normalization from a universal system format, not using programming techniques to extract the internationalization context from the first request; and to associate the internationalization context with a thread executing at the first computer as claimed by applicants. Accordingly, Applicants submit that claim 45 is patentable over *Levy*.

Regarding claim 52, the Examiner states that *Levy* teaches that "whenever the data needs to be passed to another external or interfacing device (or routine), a denormalization routine is applied which uses among other things, a user identifier to retrieve information particular to that user." *Levy*, ¶ 14. However, *Levy* does not teach generating a main body of a request, and attaching an internationalization context to the main body, wherein the internationalization context is not added to the application interface. Accordingly, Applicants submit that claim 45 is patentable over *Levy*.

Regarding Claim 53, the Office Action provides neither a rejection nor an allowance for dependent claim 53. However, because Applicants believe to have traversed the rejection regarding independent Claim 52, Applicants assert that claim 53, is in condition for allowance.

Regarding claims 11-20 and 28-32, 34-42, 44, and 46-51, each of theses claims depends from one of independent Claims 1, 21 or 44. Because Applicants believe to have traversed the rejection regarding independent Claims 10, 27, 33, 43, or 45,

Applicants assert that the rejection, as applied to these dependent claims, is also traversed without the need for further remarks.

### **Claim Rejections - 35 USC § 103**

Claims 2, 5-7 and 24-25 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Chiles* in view of *Levy*. Applicants respectfully traverse the rejection.

Regarding claims 2, 5-7, and 24-25, each of these claims depends from one of independent claims 1 or 21, respectively. To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). See also MPEP § 2143.03. Applicants submit that because *Chiles* fails teach the invention claimed in independent claims 1 or 21, the rejection of claims 2, 5-7 and 24-25 is obviated without need for further remarks by applicant.

### **Conclusion**

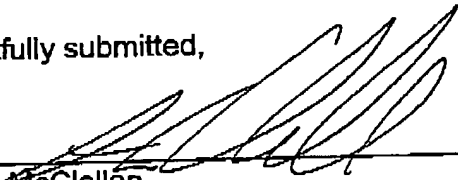
The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, Applicants believe that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

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Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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